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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PAULO ALFONSO PEREZ-MENDOZA,  
  
Defendant.

CASE NO. 2:24-CR-00073 DJC

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: June 27, 2024

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

**STIPULATION**

1. By previous order, this matter was set for status on June 27, 2024.
2. By this stipulation, defendants now move to continue the status conference until August 15, 2024, at 9:00 a.m., and to exclude time between June 27, 2024, and August 15, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes 17,022 Bates Stamped pages of material, including recordings and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
  - b) On April 11, 2024, the government has communicated a plea offer to the defendant.

1 c) Counsel for the defendant desires additional time to review the discovery  
2 material, conduct further investigation, and consider the government's plea offer.

3 d) Counsel for defendants believe that failure to grant the above-requested  
4 continuance would deny them the reasonable time necessary for effective preparation, ]taking  
5 into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of June 27, 2024 to August 15, 2024,  
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
13 because it results from a continuance granted by the Court at defendant's request on the basis of  
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
15 of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
18 must commence.

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2 IT IS SO STIPULATED.

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4 Dated: June 18, 2024

PHILLIP A. TALBERT  
United States Attorney

5  
6 /s/ KAREN A. ESCOBAR  
KAREN A. ESCOBAR  
Assistant United States Attorney

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9 Dated: June 18, 2024

/s/ Meghan McLoughlin  
Meghan McLoughlin  
Counsel for Defendant  
Paulo Alfonso Perez-Mendoza

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13 **ORDER**

14 IT IS SO FOUND AND ORDERED this 21<sup>st</sup> day of June, 2024.

15  
16 /s/ Daniel J. Calabretta  
17 THE HONORABLE DANIEL J. CALABRETTA  
18 UNITED STATES DISTRICT JUDGE  
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